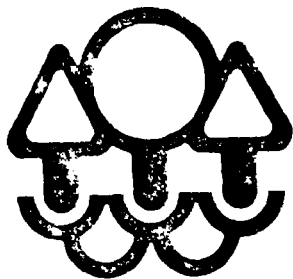




469809



Minnesota Pollution Control Agency

December 22, 1982

Mr. Donald Thimsen, P.E.
Manager, Environmental Engineering
Engineering Policy
General Mills, Inc.
P.O. Box 1113
Minneapolis, Minnesota 55440

Dear Mr. Thimsen:

I received the latest status report regarding General Mills study at the Henkel property on December 10, 1982. Either Lisa Thorivg (612/297-3347) or I of the Minnesota Pollution Control Agency (MPCA) staff should be notified of the date(s) for water sample collection so that we have an opportunity to split the samples.

At our July 13, 1982, meeting General Mills presented the MPCA staff with some general ideas regarding remedial actions that General Mills may be willing to take to cleanup the site. Lisa and I have discussed your ideas and have also met with other MPCA staff members to discuss the MPCA requirements for these types of remedial actions. I would like to present the status of our in-house discussion to date so that when we meet this winter discussions regarding remedial actions can be more specific and hopefully more productive. The following is the status of the issues and discussion:

1. Requirements for a ground water pumpout system to the storm sewer. Depending upon the proposed pumping rate and OSHA's trichloroethylene ambient air quality restrictions, the MPCA staff believes this option would require some minimal pretreatment of the contaminated ground water and the issuance of a NPDES permit for the discharge of contaminated water to the storm sewer.
2. Classification of the contaminated soils as hazardous or nonhazardous waste. The MPCA staff believes that testing would be required on any excavated contaminated soils that General Mills wanted to dispose of in Minnesota in order to determine if the soil would be classified as a hazardous or nonhazardous waste. The soil would have to be tested for both the characteristics of ignitability and toxicity. Also, the soil would have to be separated into three categories for testing: highly contaminated soils; medium contaminated soils; and lightly contaminated soils. General Mills, Inc. would not be required by the MPCA to do extensive testing of the soils if they would classify the soils as hazardous waste and send the soils to a state and federally

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Mr. Donald Thimsen
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approved hazardous waste disposal facility. Under those conditions, only the testing required by the selected disposal facility would have to be conducted.

3. Incineration of contaminated soils in a portable rotary kiln.
Either an air quality permit or a hazardous waste disposal permit would be required depending upon the contaminated soil classification. In order to issue a permit the Air Quality Division would require specific information on the type and operation of the kiln and on the concentration of volatile organics released into the atmosphere during operation of the kiln. A preliminary test burn including appropriate stack emission testing would be required.
4. Landspreading of contaminated soils on property owned by General Mills.
Either a solid waste disposal permit or hazardous waste disposal permit would be required depending upon the soil classification. In order to issue a permit the Solid and Hazardous Waste Division would require classification of the soil characteristics at the proposed landspreading site, determination of appropriate land application rates via some bench or pilot scale testing and environmental monitoring at the landspreading site. In general, if soils at the proposed landspreading site are classified as coarse sands and gravels or if the slope of the land exceeds six percent, then the site would not be acceptable for landspreading.

I hope the above discussion provides you with some idea of the MPCA's thoughts on the remedial action ideas discussed at our July 13, 1982 meeting. Please feel free to contact me or Ms. Thorvig, if you have any questions on the above.

Sincerely,

M. Ayers 12/20/82

Michael B. Ayers
Site Response Unit
Regulatory Compliance Section
Solid and Hazardous Waste Division

MBA/sf

cc: Allan Gebhard, Barr Engineering Company
Ed Monteleone, Hennepin County Department of Public Works
Robert Lines, Minneapolis Department of Inspection

bcc: Michael Ayers, Solid and Hazardous Waste Division
Lisa Thorvig, Solid and Hazardous Waste Division
Gary Kimball, Division of Water Quality
Gary Pulford, Division of Air Quality